

TECHNICAL NOTE			VELOCITY		
Client	Hampstead Asset Management Ltd (Haml) And Builder Depot Limited (Bdl)			Page No.	1 of 4
Project	14 Blackburn Road, Camden			Project No.	22/227
Subject	Response to TfL Consultation			Document No	TN001
Prepared By	PM	Checked and Authorised By	MD	Date	February 2025

1 INTRODUCTION

1.1 NOTE PURPOSE

1.1.1 Velocity Transport Planning has been appointed by Hampstead Asset Management Ltd (HAML) and Builder Depot Limited (BDL) to produce a Technical Note (TN) to address comments from Transport for London (TfL) in relation to the proposed development at 14 Blackburn Road, Camden.

1.1.2 Planning permission (ref: 2024/1145/P) is sought for the following (the 'Proposed Development'):

Erection of three floors of commercial floorspace (Use Class (E(g)) over the 5th to 7th floors with cycle parking, and associated works (the proposed development is designed to be developed above the eastern block granted planning permission on 06/01/04 under Ref: PWX0202103 as amended by 2023/1292/P dated 25/07/24 for redevelopment of whole site by the erection of a 4 storey eastern block comprising two Class B8 and eight Class B1 units with associated service yard, together with a 4 storey plus basement western block comprising 8 dwellinghouses and 6 self-contained flats with associated underground car-parking which has been lawfully implemented).

1.1.3 Following consultation, TfL's Spatial Planning team has provided comments on the scheme. This TN has been produced to address the comments raised and provide justification for the suitability of the proposed scheme.



2 RESPONSE TO TFL SPATIAL PLANNING TEAM COMMENTS

- 2.1.1 **TfL Comment 1:** *“All comments we previously made from TfL Spatial Planning on application ref no. 2023/1292/P remain relevant, and we re-submit them in response to this consultation. Please confirm by return email they will be re-tabled and formally considered.”*
- 2.1.2 **Velocity Response:** The Section 73 (s73) application (reference 2023/1292/P) relates to an amendment that has been approved by LBC. The proposed development associated with the latest application (2024/1145/P) comprises an additional three storeys of commercial floorspace above the eastern block only. As such, the comments previously made by TfL Spatial Planning on the s73 application are not relevant to this application.
- 2.1.3 **TfL Comment 2:** *“I note your separate discussions with my colleagues in London Underground (LU) regarding the station upgrade project and Infrastructure Protection (IP) matters. Please continue to consider their input formally in the planning process.”*
- 2.1.4 **Velocity Response:** This is noted and agreed.
- 2.1.5 **TfL Comment 3:** *“As we commented separately on the 2023/1292/P application, the car parking proposed to serve residential land use at the site is not London Plan compliant. This fundamentally fails to comply with London Plan policy T6 Car parking in full, and particularly part L which states “Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.”*
- 2.1.6 **Velocity Response:** The proposed development relates to three additional storeys of commercial floorspace above the eastern block only. The residential parts of the site (located in the western block) are not subject to this planning application. As such, comments relating to the level of parking for residents in the western block are not relevant. The proposed additional commercial space will be car-free in accordance with London Plan and LBC parking policy.
- 2.1.7 **TfL Comment 4:** *“Relatedly, despite the Certificate of Lawfulness awarded due to some form of commencement of construction for the historic permission, it is not accurate as the Transport Statement submitted for this application argues that the existing permission has been ‘implemented’ and represents baseline conditions and transport activities at the site. For the purposes of impact assessment, current site operations should be the baseline above which net additional impact is projected, assessed, and proposed to be appropriately mitigated. This is necessary to ensure full compliance with London Plan policies T3 and T4.”*
- 2.1.8 **Velocity Response:** As set out in the TA, and validated by the Certificate of Lawfulness being granted, the historic planning permission has lawfully been implemented. Furthermore, the s73 application for amendments to this planning permission has been approved. As such, the associated trips are permitted to take place on the surrounding transport networks, and the TA has assessed the impact of the proposed commercial development proposals on that scale of development as the baseline position. It should be remembered that this planning application is only for three additional commercial floors, and the TA has properly assessed the impact of the trips associated with the proposed development on the transport network. Whilst it may have been appropriate to consider the “current site operations” in connection with approval of the s73 permission, we note that this was not required, and the s73 was approved. The transport impacts of the s73 permission have therefore been accepted.



Page No.	3 of 4	Project No.	22/227	Document No.	TN001	Date	February 2025
----------	--------	-------------	--------	--------------	-------	------	---------------

2.1.9 It is also noted that the development proposals are expected to generate a low increase in peak hour trips on any one mode of transport. The proposals will not therefore have a severe impact on the surrounding transport networks, which would warrant development being prevented on transport grounds.

2.1.10 **TfL Comment 5:** *"The TA states that "Based on the level of additional trips associated with the Proposed Development and the availability of high- capacity, high-frequency public transport services in proximity to the Site, it is determined that the Proposed Development will have no material impacts on the surrounding transport networks."*

We disagree strongly with this given that the site must contribute proportionately to the strategic transport mitigation package agreed separately as part of the wider masterplan. This contention should not be accepted by the Council in your planning assessment of transport impacts and it should be removed from the TA."

2.1.11 **Velocity Response:** The TA paragraph quoted is considered to be an accurate assessment of the Proposed Development’s transport impacts, as is required to be assessed under LBC and TfL TA guidance.

2.1.12 It is noted that LandSec agreed a strategic transport mitigation package as part of their O2 Masterplan scheme, which package was secured by s.106 agreement. The applicant has agreed to contribute a proportion of the O2 Masterplan’s strategic transport mitigation package, based on the floorspace of the proposed development in comparison with that of the O2 Masterplan floorspace. Whilst this approach has not yet been agreed with LBC, this approach is considered to represent an appropriate means of identifying a proportionate contribution to the strategic transport mitigation package.

2.1.13 **TfL Comment 6:** *"As we have previously commented the 'implemented' development repeatedly referred to includes a number of proposed transport features, for example the residential car parking, and the proposed servicing and deliveries arrangement involving larger delivery vehicles reversing into the service yard from Blackburn Road, which do not comply with the London Plan or the latest Local Plan in transport terms."*

2.1.14 **Velocity Response:** As explained previously, the planning application for the Implemented Development has been approved and has lawfully been implemented. As such, the compliance of the transport features listed with London Plan or Local Plan policy is not applicable to this application which is only for three additional floors above the consented scheme.



Page No.	4 of 4	Project No.	22/227	Document No.	TN001	Date	February 2025
----------	--------	-------------	--------	--------------	-------	------	---------------

3 CONCLUSION

- 3.1.1 In summary, it is considered that the Proposed Development at 14 Blackburn Road, Camden is suitable and will not result in a severe impact on the local highway network or an unacceptable impact on highway safety.
- 3.1.2 This TN has addressed the comments and concerns raised by the TfL, and therefore there are no transport or highway reasons that should prevent the approval of the planning application, subject to an appropriate financial contribution being agreed.

